

JESSE LASLOVICH  
United States Attorney  
MADISON L. MATTIOLI  
MT Bar No. 36411284  
ABBIE J.N. CZIOK  
MT Bar No. 55781377  
Assistant U.S. Attorneys  
U.S. Attorney's Office  
901 Front Street, Suite 1100  
Helena, MT 59626  
Phone: (406) 457-5269 – Madison  
(406) 457-5268 – Abbie  
Email: madison.mattioli@usdoj.gov  
abbie.cziok@usdoj.gov

Attorneys for Federal Defendants and  
Defendant United States of America.

MARK STEGER SMITH  
MT Bar No. 4160  
TIMOTHY A. TATARKA  
CA Bar No. 277219  
Assistant U.S. Attorneys  
U.S. Attorney's Office  
James F. Battin Federal Courthouse  
2601 2nd Ave. North, Suite 3200  
Billings, MT 59101  
Phone: (406) 247-4667 – Mark  
(406) 247-4642 – Tim  
Email: mark.smith3@usdoj.gov  
timothy.tatarka@usdoj.gov

**IN THE UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA, OAKLAND DIVISION**

CALIFORNIA COALITION FOR WOMEN  
PRISONERS; R.B.; A.H.R.; S.L.; J.L.; J.M.;  
G.M.; A.S.; and L.T., individuals on behalf of  
themselves and all others similarly situated,

Plaintiffs

v.

UNITED STATES OF AMERICA FEDERAL  
BUREAU OF PRISONS, a governmental entity;  
BUREAU OF PRISONS DIRECTOR  
COLETTE PETERS, in her official capacity;  
FCI DUBLIN WARDEN THAHESHA JUSINO,  
in her official capacity; OFFICER  
BELLHOUSE, in his individual capacity;  
OFFICER GACAD, in his individual capacity;  
OFFICER JONES, in his individual capacity;  
LIEUTENANT JONES, in her individual  
capacity; OFFICER LEWIS, in his individual  
capacity; OFFICER NUNLEY, in his individual  
capacity; OFFICER POOL, in his individual  
capacity; LIEUTENANT PUTNAM, in his  
individual capacity; OFFICER SERRANO, in  
his individual capacity; OFFICER SHIRLEY, in  
his individual capacity; OFFICER SMITH, in his  
individual capacity; and OFFICER VASQUEZ,  
in her individual capacity,

Defendants.

CASE NO. 4:23-CV-04155-YGR

**DECLARATION OF BETH REESE**

1 I, Beth Reese, declare as follows:

2 1. I have personal knowledge of the facts set forth herein and if called as a witness I could  
3 competently so testify.

4 2. I am the Chief of the Office of Internal Affairs (OIA) for the federal Bureau of Prisons  
5 (BOP). I have held this role since May of 2018. I oversee the work of approximately 145 staff  
6 throughout the United States.

7 3. OIA an independent component of the Director's Office and is responsible for classifying  
8 all allegations of BOP employee misconduct it receives and investigating serious but non-criminal  
9 employee misconduct.

10 4. OIA can receive allegations from any number of sources to include inmates, inmates'  
11 families, advocacy organizations, the press, Congress, prison staff, or a facility's Warden.

12 5. When OIA receives an allegation, it must determine whether it alleges staff misconduct  
13 and whether there is sufficient information to undertake a meaningful investigation.

14 6. If the answer to both of those questions is yes, OIA moves forward with classifying the  
15 allegations in one of three categories. Classification One cases are defined as allegations which, if  
16 substantiated, would constitute a prosecutable offense (except for Classification Three cases such as  
17 traffic violations, DUI, DWI, etc.) and any allegation of serious misconduct, such as unauthorized  
18 disclosure of sensitive information. Classification Two cases are defined as allegations of serious  
19 misconduct, but if substantiated would not likely result in criminal prosecution. Classification Three  
20 cases are defined as allegations of misconduct which ordinarily have less impact on institutional  
21 operations.

22 7. The Office of the Inspector General (OIG) for the U.S. Department of Justice (DOJ) is a  
23 statutorily created independent entity whose mission is to detect and deter waste, fraud, abuse, and  
24 misconduct in the Department of Justice.

25 8. OIG has jurisdiction over the criminal and administrative misconduct of all DOJ staff.

26 9. OIG can review all allegations sent to OIA and has the right of first refusal on all OIA  
27 cases.

1           10.     Since late 2021 at FCI Dublin, allegations of sexual misconduct (i.e., that if true would be  
2 criminal) have been investigated by OIG or the FBI and have not been handled by the local institution.  
3 Only if OIG declines to retain a case is it sent back to OIA.

4           11.     Since late 2022, and to ensure that appropriate protocols are followed with regard to staff  
5 on inmate sexual misconduct allegations, OIA has sent a weekly list to each of the six Regional  
6 Directors notifying them of all of the sexual misconduct cases that were opened out of their region each  
7 week. This feedback loop allows the region to review each of the allegations and follow up with staff at  
8 the institution to ensure that staff are reassigned as appropriate, and that appropriate protocols are  
9 provided to victims even in situations where the allegation was submitted directly to OIA and not  
10 through local reporting mechanisms.

11           12.     Because there are times that allegations will be presented directly to OIG, OIA has  
12 worked to ensure open communication with OIG regarding their investigation of potential sexual  
13 misconduct allegations that may arise. Since 2021, the Los Angeles field office of OIG has adopted a  
14 practice of notifying OIA of the identity of subjects of their investigations at such time as it is apparent  
15 that there are meritorious allegations of inappropriate touching so the BOP can take appropriate action  
16 with regard to the status of the subject(s).

17           13.     Communication between OIA and OIG has also allowed the BOP an enhanced ability to  
18 identify and address allegations of retaliation against victims for reporting staff. Actions taken in  
19 connection with retaliation have included relocation of the incarcerated person (in an instance of non-  
20 specific discomfort) and misconduct cases being opened to address the allegations (where there appear  
21 to be policy violations or unequal treatment).

22           [REDACTED]  
23 [REDACTED]  
24 [REDACTED]  
25 [REDACTED]  
26           [REDACTED]  
27 [REDACTED]  
28 [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

I declare under penalty of perjury pursuant to 28 U.S.C. § 1746 that the foregoing is true and correct. Executed this 4th day of March, 2024, at Aurora, Colorado.

By: **BETH REESE** Digitally signed by BETH REESE  
Beth Reese Date: 2024.03.04 10:24:52 -05'00'